



June 2, 2021

VIA E-FILING

The Honorable Leonard P. Stark
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3556

RE: *Datacloud Technologies, LLC v. Squarespace, Inc.*
C.A. No. 21-cv-164-LPS
Hangers Solutions, LLC v. Squarespace, Inc.
C.A. No. 21-cv-774-UNA

Dear Chief Judge Stark:

We represent the defendant, Squarespace, Inc. (“Squarespace”), in the above cases in which the plaintiffs are represented by the same counsel. We write to notify the Court that we believe the Hanger Solutions action (C.A. No. 21-cv-774-UNA) should have been marked related to the DataCloud action (C.A. No. 21-cv-164-LPS) pursuant to D. Del. LR 3.1(b) given (1) the same Squarespace computer systems are at issue in both cases (*see* Del. LR 3.1(b)(1); DataCloud D.I. 1 at ¶¶ 19-41; Hanger Solutions D.I. 1 at ¶¶ 18-53); (2) plaintiffs DataCloud and Hanger Solutions are both subsidiaries of Brainbox Innovations, LLC (*see* Del. LR 3.1(b)(2); DataCloud D.I. 4; Hanger Solutions D.I. 4); and (3) Squarespace will be raising invalidity defenses in both cases that are in some respects identical and are preferably decided by a single judge. (*See* Del. LR 3.1(b)(4); DataCloud D.I. 16-17)

We are available at the Court’s convenience should Your Honor have any questions.

Respectfully submitted,

/s/ Brian E. Farnan

Brian E. Farnan

cc: Counsel of Record (via E-File)